

HOWARD C. MISKIN (HM7038)
GLORIA TSUI-YIP (GT9377)
WENDI OPPER UZAR (WO4547)
Attorneys for Plaintiff
TOPCARE PRODUCTS, INC.
Miskin & Tsui-Yip LLP
1350 Broadway, Suite 802
New York, New York 10018
(212) 268-0900
howard@mt-iplaw.com

09

634

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X
TOPCARE PRODUCTS, INC.

Plaintiff,

v.

ROYAL MANUFACTURING, INC.
Defendants.
-----X

Civil Action No.

ECF CASE

BLOCK, J.

GOLD, M.J.

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
FEB 12 2013
BROOKLYN OFFICE

COMPLAINT

Plaintiff, Topcare Products, Inc. (hereinafter "Topcare" or "Plaintiff"), complains of the defendant, Royal Manufacturing Inc. (hereinafter "Royal" or "Defendant"), as follows:

JURISDICTION AND VENUE

1. This action for copyright infringement arises under the Copyright Act of 1976, Title 17 U.S.C. §101 et. seq.
2. This court has federal question jurisdiction under 28 U.S.C. §§1331 and 1338(a)(b).
3. Venue in this judicial district is proper under 28 U.S.C. §1391(b) and (c), and

§1400(a), in that a substantial part of the acts or omissions giving rise to the claim herein occurred within this judicial district.

4. This Court has personal jurisdiction over Royal in this action by virtue of the fact that it is doing or transacting business here and has committed acts in this district that, as described further below, are designed to infringe Topcare's copyrights.

5. Defendant directly and via its agents, transacts business within this district and derives substantial revenue from this district.

THE PARTIES

6. Topcare Products, Inc. is a New York corporation with its principal place of business located at 10 Jay Street, Suite 402, Brooklyn, New York 11201.

7. Upon information and belief, defendant Royal Manufacturing Inc. is a New Jersey Corporation with its principal place of business located at 24 Sheridan Ave., Clifton, NJ 02011.

COUNT I **COPYRIGHT INFRINGEMENT**

8. Topcare is in the business of creating and acquiring original artwork for use in garments, shower curtains, rugs, etc.

9. Topcare is the owner of all right, title and interest in and to each of the designs identified below:

- a) Scashell Design;
- b) Elephant;
- c) Black & White;
- d) Leaf Pattern;
- e) Burgundy Rose;

- f) Abstract Floral;
- g) Elephant 2006;
- h) Flowers on Blue Wash;
- i) Flowers on Beige Wash;
- j) Butterflies;
- k) Black & Grey;
- l) Seashell Green; and
- m) Forget Me Not; (collectively hereinafter "Subject Designs").

A true copy of each design is attached hereto as Exhibit A.

10. The Subject Designs are original works, and the designs are copyrightable subject matter under the copyright laws of United States, 17 U.S.C. § 101 *et seq.*

11. Topcare has duly obtained copyright Certificates of Registration covering its Subject Designs, as follows:

- a) "Book 1 of Designs," Copyright Registration No. VA1-420-294;
 - b) "Book #1 (Book of 14 Designs)," Copyright Registration No. VA1-369-888; and
 - c) "Book 1 of Botanic Designs," Copyright Registration No. VA1-420-292
- (collectively hereinafter "Copyrights").

A true copy of the Copyright Registration, Nos. VA1-420-294, VA1-369-888, and VA1-420-292 are attached hereto as Exhibit B.

12. Pursuant to §106 of the Copyright Act, Topcare has the exclusive right to reproduce and distribute, and to authorize others to reproduce and distribute copies of the Subject Designs.

13. Upon information and belief, Royal had access to Plaintiff's Subject Designs and with full knowledge of Topcare's rights to these designs, knowingly disregarded those rights by making and distributing or authorizing others to make and distribute infringing reproductions of the Subject Designs.

14. On information and belief, since on or about November 2008, Royal has offered for sale and sold products bearing the Subject Designs to at least one vendor (hereinafter "Defendant's Products.") Photos of Royal's infringing designs are attached hereto as Exhibit C.

15. Royal infringed, and is infringing Topcare's Subject Designs and Copyrights by importing, producing, manufacturing, vending, distributing, selling, displaying and/or promoting shower curtains, rugs, and other products that bear a design substantially similar to the Subject Designs, and by causing and/or participating in said importing, producing, manufacturing, vending, distributing, selling, displaying and/or promoting of said infringing copies.

16. On or about December 11, 2008, a cease and desist letter was sent to Royal giving Defendant notice of the Subject Designs and Copyrights and requesting that Royal discontinue all sales of Defendant's Products and account to Topcare for past infringement.

17. On or about January 7, 2009, a second cease and desist letter was sent to Royal, again giving Defendant notice of the alleged infringement and requesting that Royal discontinue all sales of Defendant's Products and account to Topcare for past infringement.

18. On information and belief, subsequent to January 7, 2009, Royal continues to sell and offers for sale products with infringing reproductions of the Subject Designs.

19. All of the aforementioned activities of Defendant are in violation of the rights of Topcare under 17 U.S.C. §101 *et seq.*

20. All of Defendant's aforementioned acts were without permission, license or consent of Topcare.

21. Topcare has been damaged by Defendant's actions in an amount as yet unknown and Defendant is further continuously damaging Topcare in a manner wherein Topcare has no adequate remedy at law and Defendant's acts, if continued, will damage Topcare in an amount as yet unknown. As a direct and proximate result of the foregoing acts of infringement by the Defendant, Topcare has been harmed and is entitled to recover, in addition to its attorney's fees and cost of suit, its damages and Defendant's profits attributable to the infringement pursuant to §504 of the Copyright Act, in an amount to be established at trial or, alternatively, statutory damages in the maximum amount for deliberate and willful infringement at the election of Topcare. In addition, Topcare has been and, unless Defendant is enjoined, will be irreparably harmed.

WHEREFORE, Topcare prays for judgment against Defendant as follows:

A. That the Defendant, its directors, officers, agents, servants, employees, related companies, parent companies, subsidiaries, licensees, assigns, and all parties in privity with them, be enjoined, temporarily and preliminarily during the pendency of this action and permanently from infringing the Subject Designs and Copyrights of Topcare in any manner including, but not limited to, importing, producing, manufacturing, printing, reprinting, publishing, vending, distributing, selling, displaying, promoting or advertising any copies of the Subject Designs that are the subject of Topcare's Copyright Registration Nos. VA1-420-294, VA1-369-888, and VA1-420-292, or by causing and/or participating in such importing, producing, manufacturing, printing, reprinting, publishing, vending, distributing, displaying,

selling, promoting or advertising.

B. That Defendant be required to deliver to the U.S. Marshal during the pendency of this action all infringing copies of Topcare's copyrighted items in possession or under the control of the Defendant.

C. That Defendant be required to pay to Topcare such damages as Topcare has sustained in consequence of Defendant's infringement of Topcare's Subject Designs and Copyrights.

D. For Defendant to file with this Court and serve upon Topcare, a report in writing and under oath setting forth in detail the manner and form in which Defendant has complied with the injunction.

E. For an accounting by the Defendant to Topcare of all of Defendant's profits, gains and sums arising from the alleged acts of copyright infringement.

F. For an award of statutory damages for willful infringement in the amount of \$150,000 per infringement, as prescribed in §504 of the Copyright Act.

G. For allowable prejudgment interest, costs of the suit, disbursements and reasonable attorneys' fees incurred in connection with this action as permitted by the Copyright Act.

H. For any and all such other further relief as this Court may deem just and equitable.

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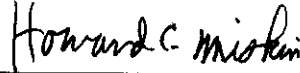
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DEMAND FOR JURY TRIAL

Trial by jury is hereby demanded as to all issues in this action so triable.

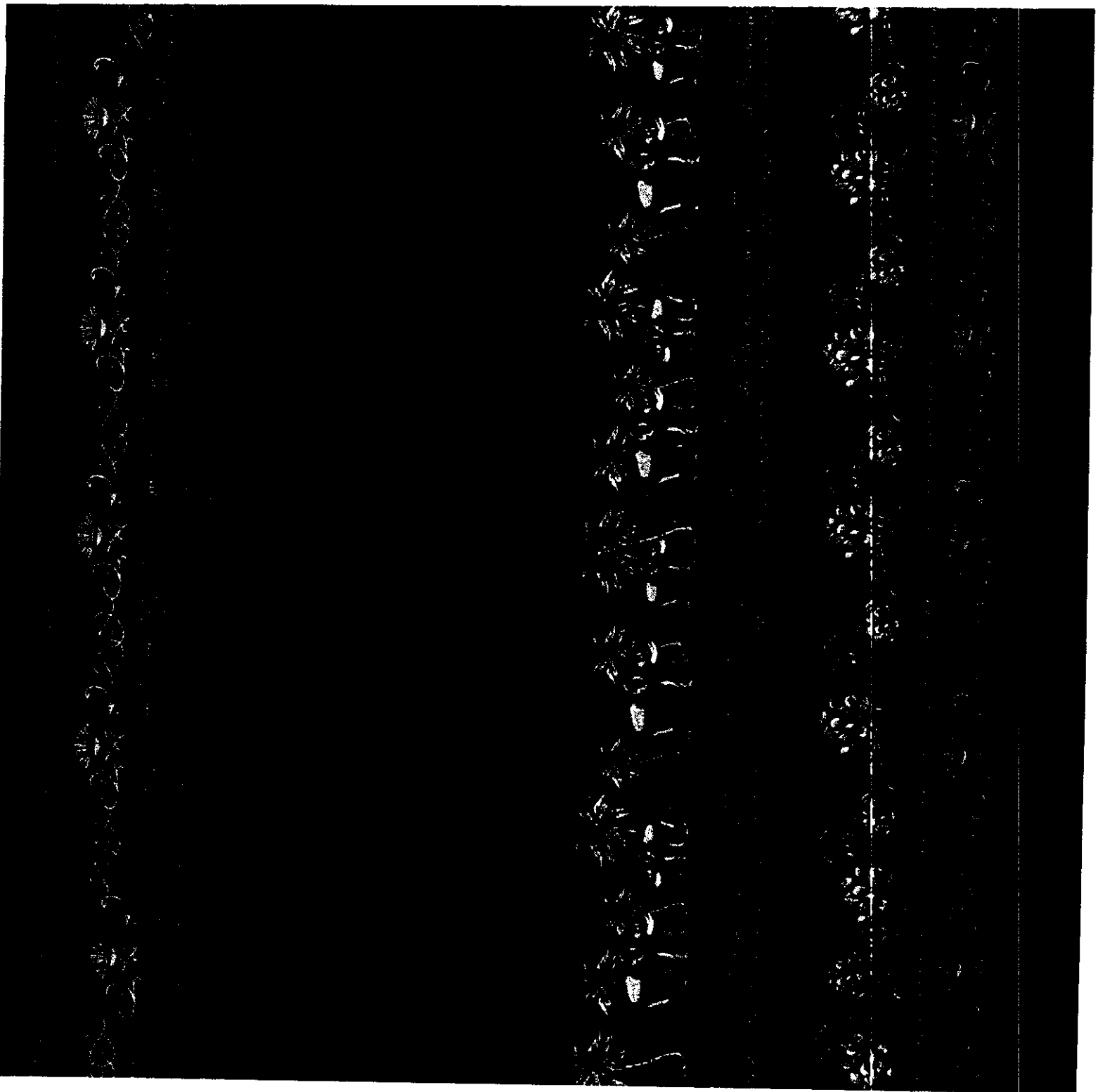
Dated: February 10, 2009
New York, New York

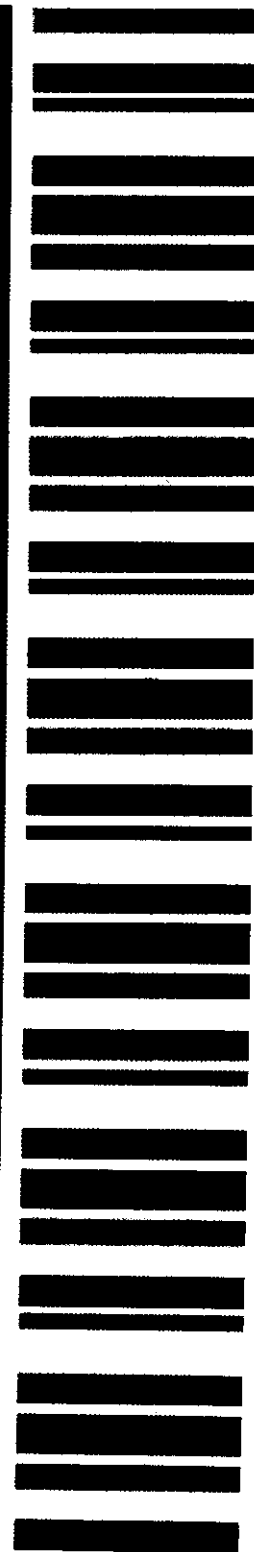
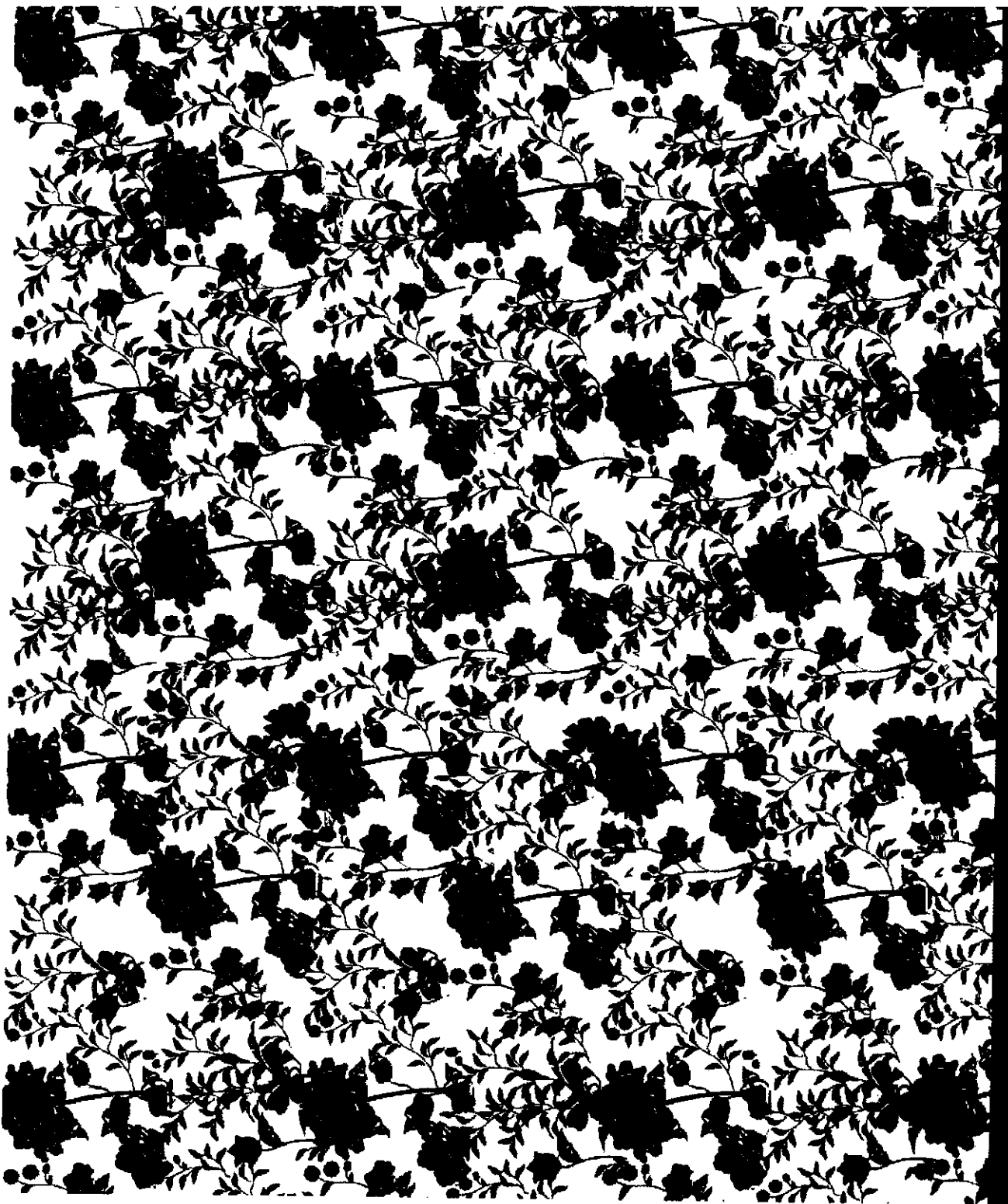


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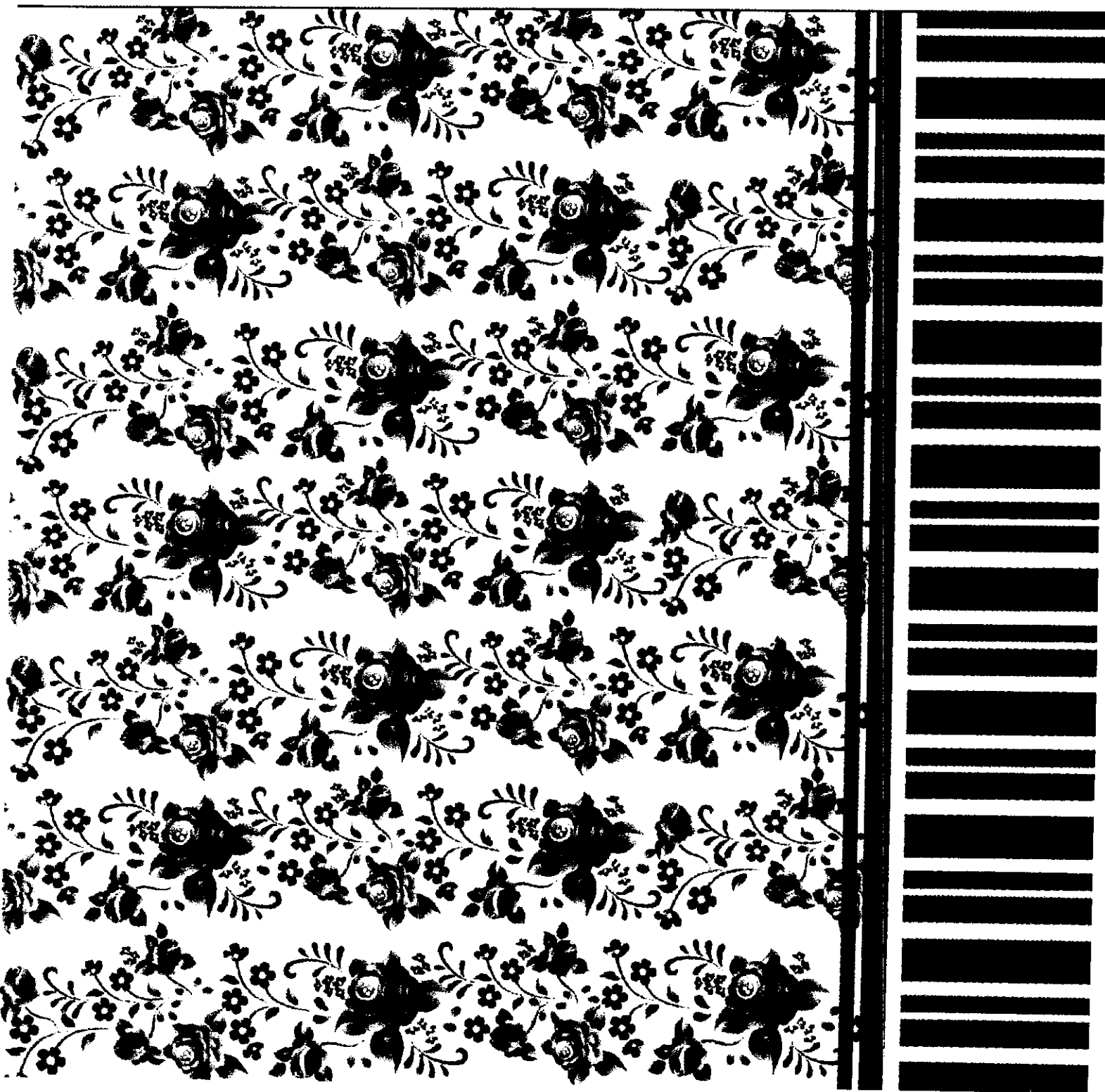
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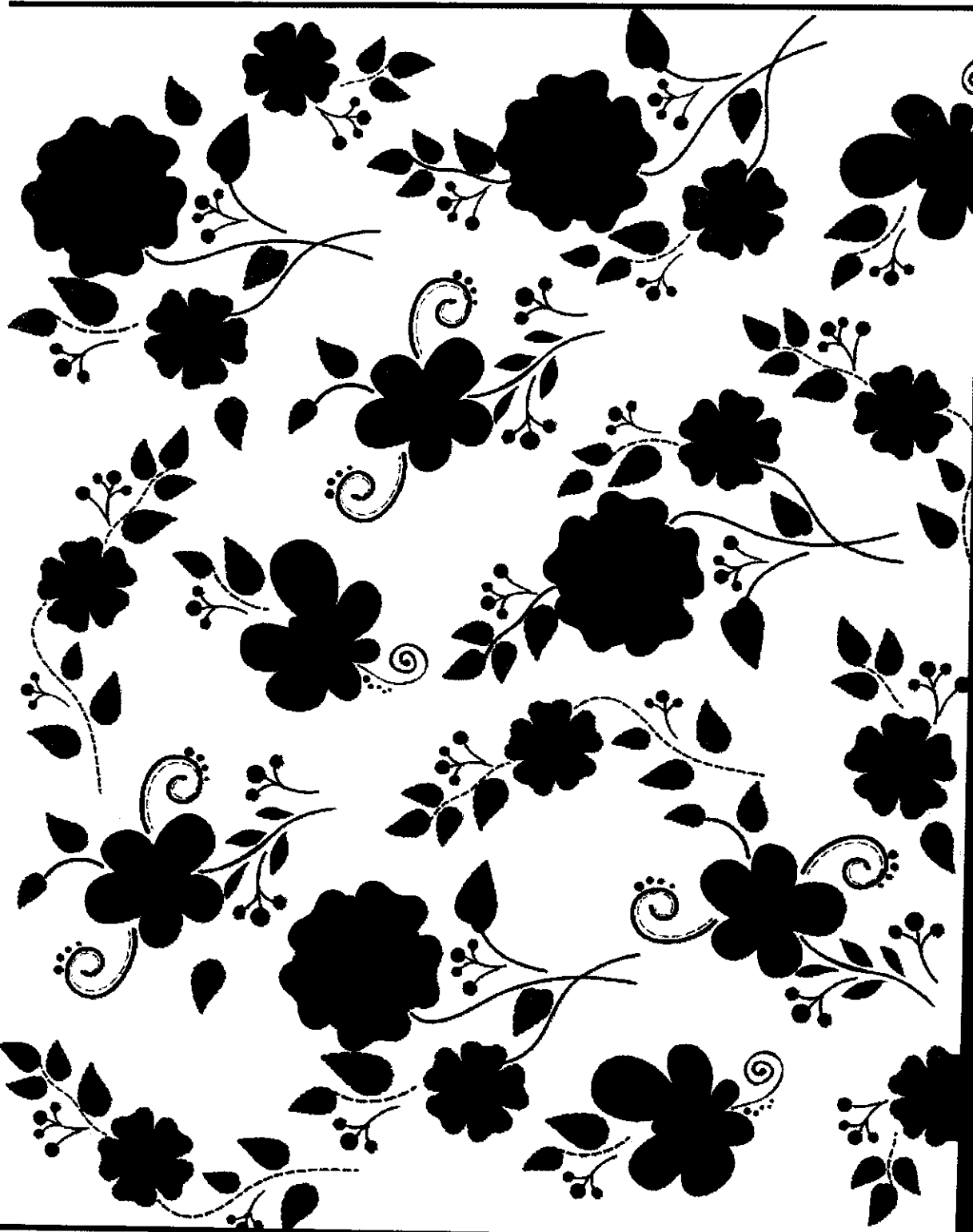


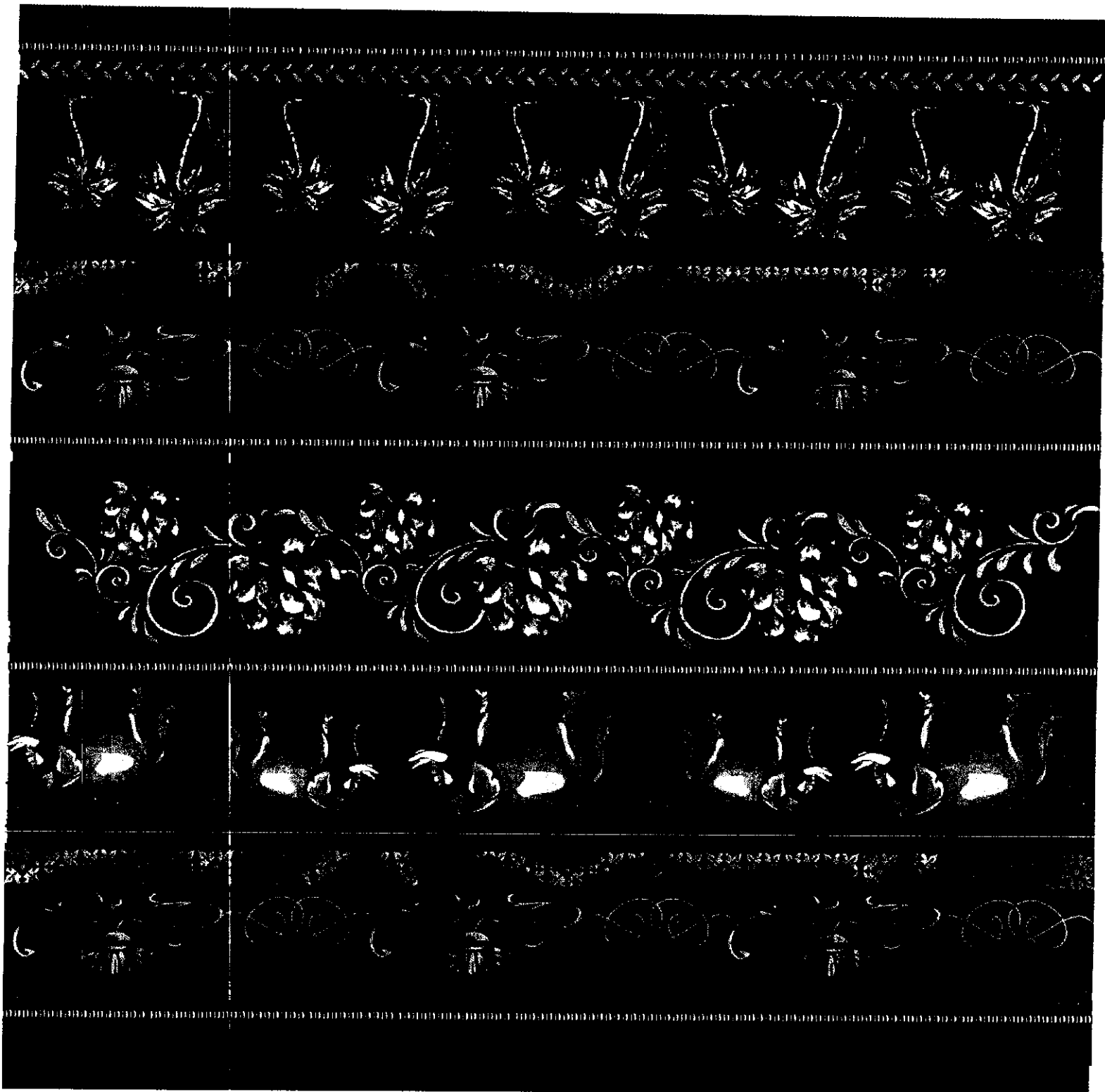


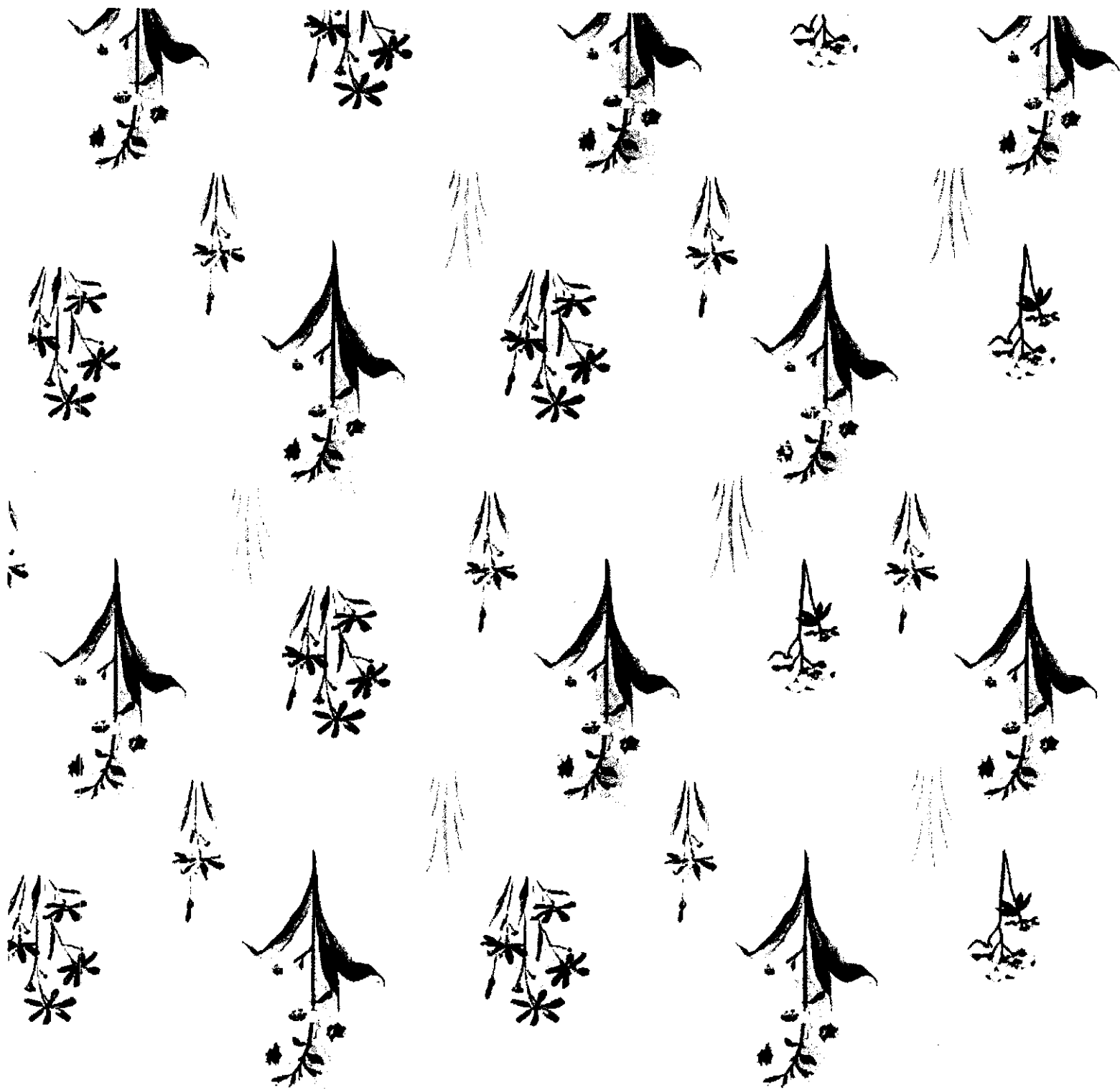


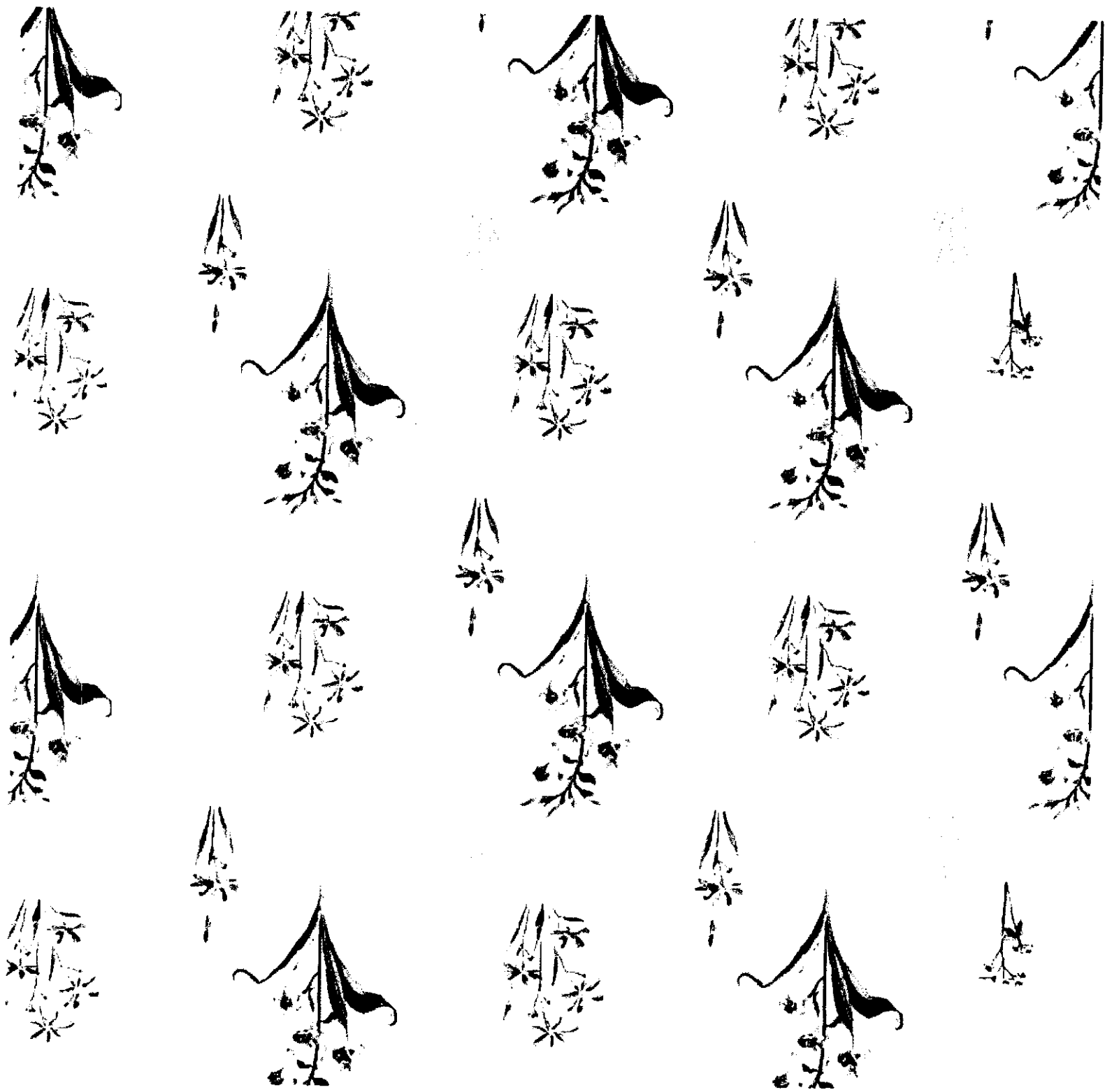


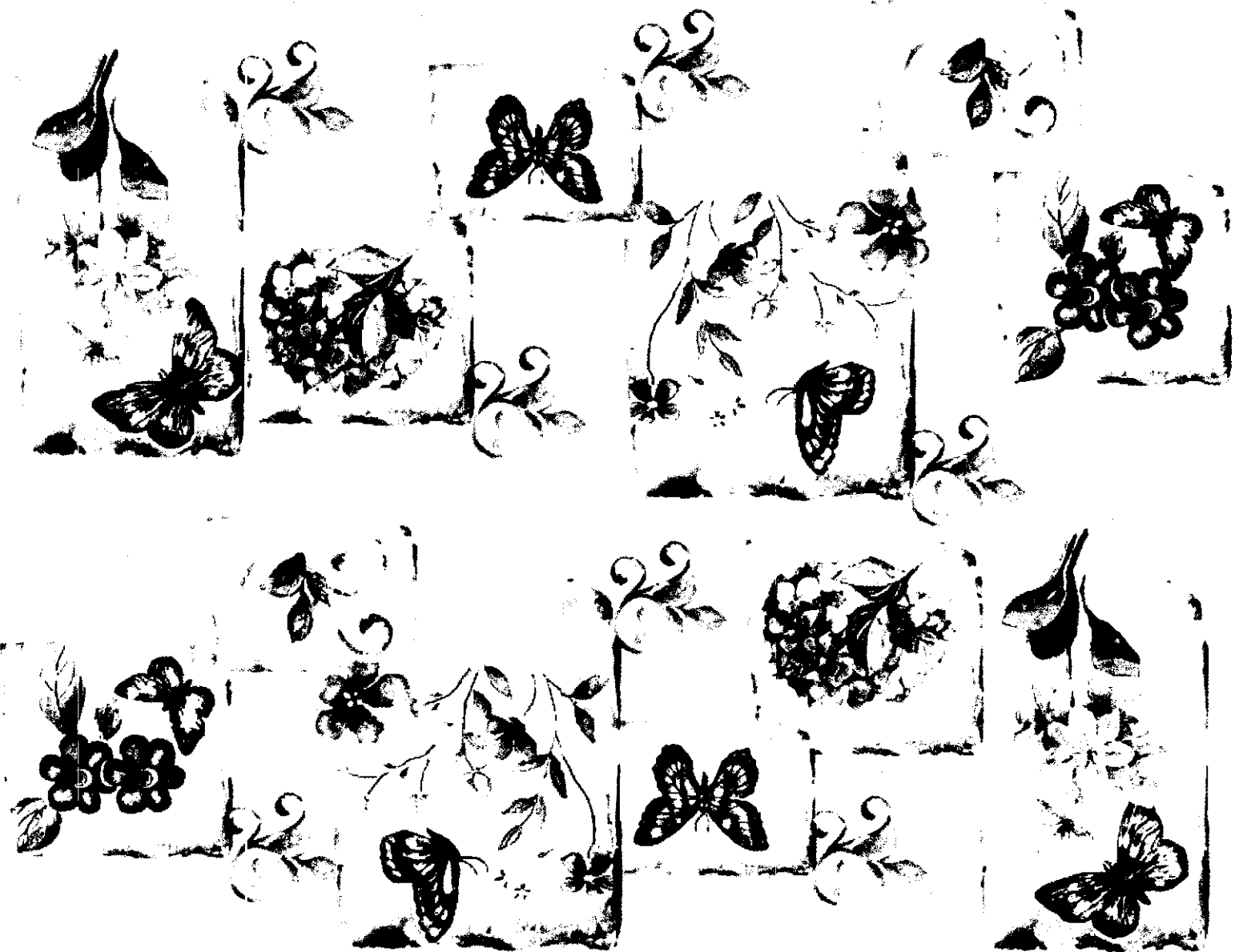


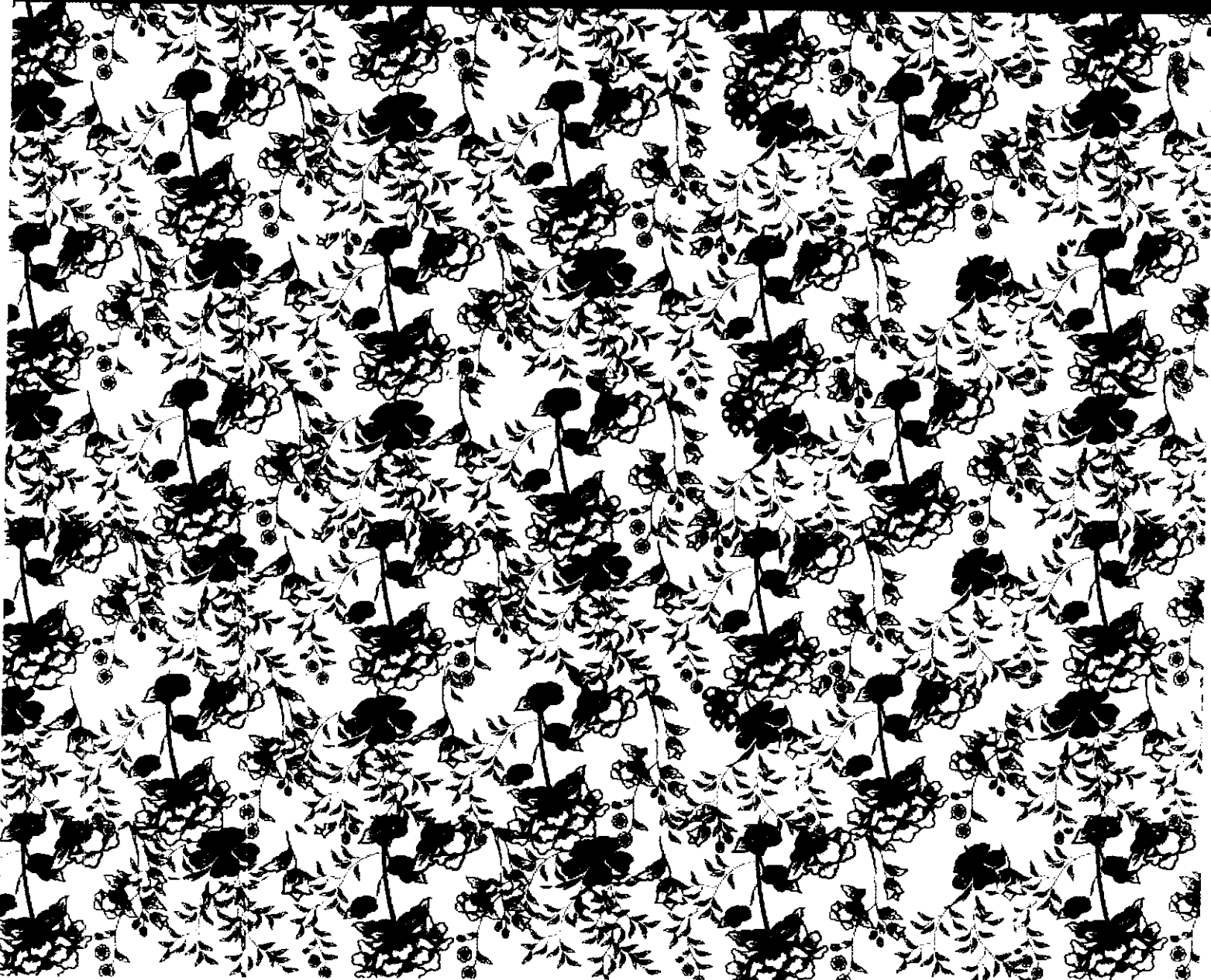




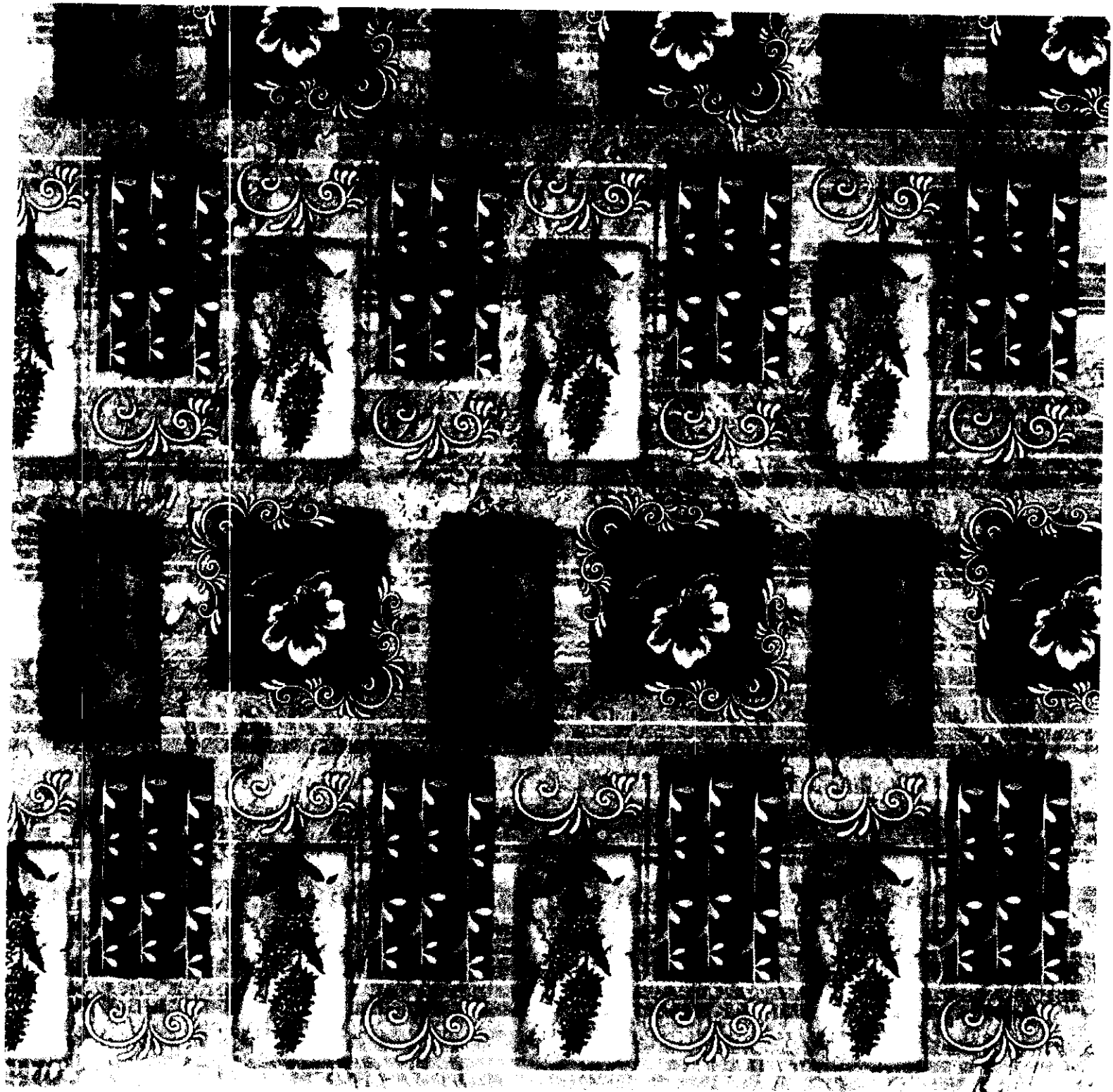












EXAMINED BY

PB

FORM VA

CHECKED BY

CORRESPONDENCE

☐ YesFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☒ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.)a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☒ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number

VA 1-369-888

Year of Registration

2006

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

Copyright Registration VA1-369-888 entitled "Book #1, Book of 14 Designs"

a

See instructions
before completing
this space

6

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

Adaptation of design, colors, layout and additional artistic work of three designs.

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name

Account Number

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip

Gloria Tsui-Yip - Stoll, Miskin & Badie
350 Fifth Avenue, Suite 4710
New York, New York 10118

b

Area code and daytime telephone number (212) 268-0900

Fax number (212) 268-0904

Email mail@smbtlaw.com

CERTIFICATION I, the undersigned, hereby certify that I am the

check only one ☐ author
☐ other copyright claimant
☐ owner of exclusive right(s)
☒ authorized agent of Topcare Products, Inc.
Name of author or other copyright claimant, or owner of exclusive right(s)

8

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

Gloria Tsui-Yip, Esq.

Date

June 18, 2007

Handwritten signature (X)

X *Gloria Tsui-Yip*Certificate
will be
mailed in
window
envelope
to this
address:

Name

Stoll, Miskin & Badie - Gloria Tsui-Yip

Number/Street Apt

350 Fifth Avenue, Suite 4710

City/State/ZIP

New York, New York 10118

CHECKLIST

Complete all necessary forms
Sign your application in space 8SEND ALL REQUIREMENTS
IN THE SAME PACKAGE1. Application form
2. Non-refundable filing fee in check or money
order payable to Register of Copyrights
3. Deposit material

DELIVER TO

Library of Congress
Copyright Office
101 Independence Avenue SE
Washington, DC 20540-4000

9

17 USC (Judge) / 17 USC who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$5,000.

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form VA
For a Work of the Visual Arts
VA 1-369-888



EFFECTIVE DATE OF REGISTRATION
6-5-06
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

Title of This Work ▼

NATURE OF THIS WORK ▼ See instructions

Book # 1

Book of 14 Designs

Fabric Designs

Previous or Alternative Titles ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared Title of Collective Work ▼

If published in a periodical or serial give Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NAME OF AUTHOR ▼

a Topcare Products, Inc

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
☒ Yes
☐ No

Author's Nationality or Domicile
Name of Country

OR Citizen of U.S.A.
Domiciled in _____

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions

Nature of Authorship Check appropriate box(es) See instructions

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2-Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Name of Author ▼

Dates of Birth and Death
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
☐ Yes
☒ No

Author's Nationality or Domicile
Name of Country

OR Citizen of _____
Domiciled in _____

Was This Author's Contribution to the Work

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Pseudonymous? ☐ Yes ☒ No

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☐ Map

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☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

3

a Year in Which Creation of This Work Was Completed
2006

This information must be given in all cases

b Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published

Month 05 Day 26 Year 2006
Nation U.S.A.

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

Topcare Products, Inc
10 Jay Street, Suite 402
Brooklyn, New York 11201

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright ▼

APPLICATION RECEIVED
JUN 05 2006
ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED
JUN 05 2006
FUNDS RECEIVED

MORE ON BACK ►

• Complete all applicable spaces (numbers 5-8) on the reverse side of this page
• See detailed instructions
• Sign the form at line 8

DO NOT WRITE HERE

Page 1 of 2 pages

EXAMINED BY *SPW*

FORM VA

CHECKED BY

☐ CORRESPONDENCE
YesFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼a. ☐ This is the first published edition of a work previously registered in unpublished formb. ☐ This is the first application submitted by the author as copyright claimantc. ☐ This is a changed version of the work, as shown by space 6 on this application

If your answer is "Yes," give Previous Registration Number ▼

Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work, complete only 6b for a compilation

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▼

a See instructions
before completing
this space

6

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed ▼

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account
Name ▼ Account Number ▼

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

b

Gloria Tsui-Yip, Stoll, Miskin & Badie
350 Fifth Avenue, Suite 4710
New York, New York 10118

Area code and daytime telephone number (212) 268-0900

Fax number (212) 268-0904

Email howard@smblaw.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ▶

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of Topcare Products, Inc.

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date

Howard C. Miskin

Date 5/26/06

Handwritten signature (X) ▼

x *Howard C. Miskin*Certificate
will be
mailed in
window
envelope
to this
address:Name ▼
Howard C Miskin Stoll, Miskin & BadieNumber/Street/Apt ▼
350 Fifth Avenue, Suite 4710City/State/ZIP ▼
New York, New York 10118

YOU MUST

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL ELEMENTS
IN THE SAME PACKAGE

- 1 Application form
- 2 Nonrefundable filing fee in check or money order payable to Register of Copyrights
- 3 Deposit material

MAIL TO

Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-6000

Fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov or call the Copyright Office at (202) 707-6000

9

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form VA
For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

VA 1-420-292

EFFECTIVE DATE OF REGISTRATION
June 27 2007

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

Title of This Work ▼

NATURE OF THIS WORK ▼ See instructions

Book 1 of Botanic Designs

Two Dimensional Designs

Previous or Alternative Titles ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NAME OF AUTHOR ▼

a Sabina Lorenc

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

1980

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

Author's Nationality or Domicile

Name of Country

OR ☐ Citizen of

☐ Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions

Nature of Authorship Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2-Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Name of Author ▼

Dates of Birth and Death

Year Born ▼

Year Died ▼

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☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

3

Year in Which Creation of This Work Was Completed

2007

This information must be given in all cases.

Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published.

Month May

Day 10

Year 2007

Nation USA

Nation

4

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10 Jay Street, Suite 402
Brooklyn, NY 11201

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

By Assignment

APPLICATION RECEIVED

JUN 27 2007
ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

JUN 27 2007
FUNDS RECEIVED

MORE ON BACK ►

Complete all applicable spaces (numbers 3-6) on the reverse side of this page.
See detailed instructions. Sign the form at line 8.

DO NOT WRITE HERE

Page 1 of 2 pages

EXAMINED	<u>RB</u>	FORM VA
CHECKED BY		
<input type="checkbox"/> CORRESPONDENCE		FOR
<input type="checkbox"/> Yes		COPYRIGHT
		OFFICE
		USE
		ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

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If your answer is "Yes," give: Previous Registration Number

Year of Registration

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b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

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Name

Account Number

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt./City/State/Zip

Gloria Tsui-Yip - Stoll, Miskin & Badie
 350 Fifth Avenue, Suite 4710
 New York, New York 10118

Area code and daytime telephone number (212) 268-0900

Fax number (212) 268-0904

Email mail@smbtlaw.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ☐ author
☐ other copyright claimant
☐ owner of exclusive right(s)
☒ authorized agent of Topcare Products, Inc.
 Name of author or other copyright claimant, or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

Gloria Tsui-Yip, Esq.

Date June 18, 2007

Handwritten signature (X)

X Gloria Tsui-YipCertificate
will be
mailed in
window
envelope
to this
address:

Name
Stoll, Miskin & Badie - Gloria Tsui-Yip
 Number/Street/Apt.
350 Fifth Avenue, Suite 4710
 City/State/Zip
New York, New York 10118

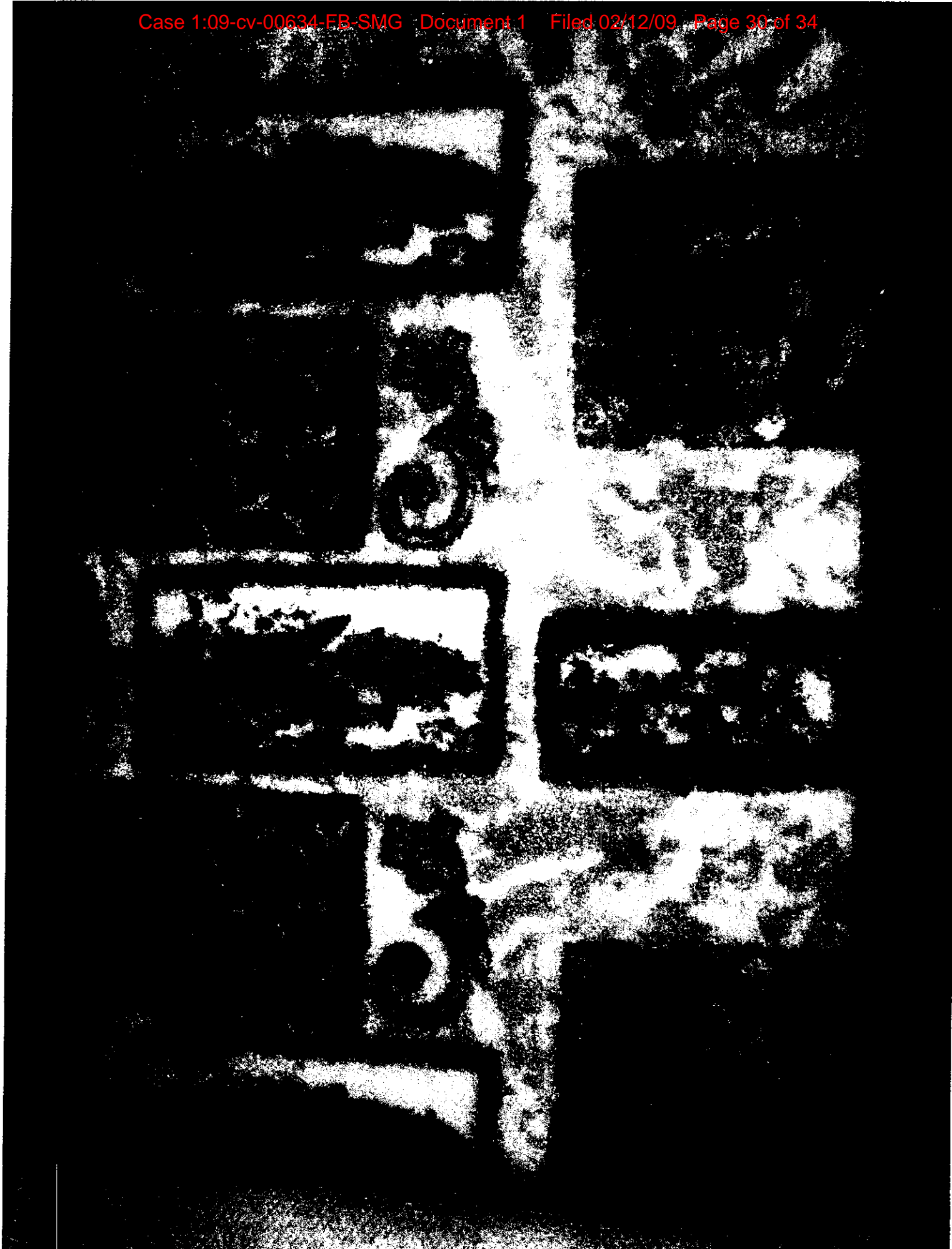
IMPORTANT
 - Complete all necessary spaces
 - Sign your application in space 8
SEND ALL FEES AND FINES IN THE SAME ENVELOPE
 1. Application form
 2. Non-refundable filing fee in check or money order payable to Registrar of Copyrights
 3. Deposit material
MAIL TO:
 Library of Congress
 Copyright Office
 101 Independence Avenue SE
 Washington, DC 20540-8002

*17 USC §508(e). Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.















1



Robertson, Steven (10/10/08)

2008-10-10 10:10:08 AM

